

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IDEARC MEDIA LLC, )  
                        )  
Plaintiff,           )  
                        )  
v.                    )  
                        )  
1-24 HOUR EMERGENCY )  
LOCKSMITH, INC.,     )  
                        )  
Defendant.           )  
                        )  
\_\_\_\_\_  
)

No. 09 CV 5462

Judge Rebecca R. Pallmeyer

Magistrate Judge Martin C. Ashman

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiff Idearc Media LLC (hereinafter “Idearc”), by its undersigned counsel of record, for its Motion for Entry of Judgment against Defendant 1-24 Hour Emergency Locksmith, Inc. (hereinafter “Locksmith”), states as follows:

1. On September 3, 2009, Idearc filed a Complaint against Locksmith seeking in excess of \$300,000 arising out of Locksmith’s failure to pay for advertisements that Idearc published for Locksmith pursuant to a series of contracts between the parties.
2. On October 22, 2009, this Court granted Idearc’s Motion for entry of default against Locksmith arising out of Locksmith’s failure to answer or otherwise plead to Idearc’s Complaint.
3. Also on October 22, 2009, the Court set this matter for a prove-up of Idearc’s damages on November 9, 2009.
4. As set forth in the Affidavit of Nancy Logue, attached hereto as Exhibit A and incorporated herein by reference, as of the date of this Motion, Idearc is entitled to damages in the amount of \$311,894.20, plus interest that continues to accrue at a rate of \$3,525.60 per month until satisfaction of the judgment.

5. As set forth in the Affidavit of Alejandro Rodriguez, attached hereto as Exhibit B and incorporated herein by reference, as of the date of this Motion, Idearc is further entitled to attorneys fees in the amount of \$11,896.00 and costs in the amount of \$556.00.

**WHEREFORE**, Plaintiff Idearc Media LLC respectfully requests that this Court enter judgment in favor of Idearc and against Defendant Locksmith in the amount of \$324,346.20 pursuant to Federal Rule of Civil Procedure 55(b), and award Plaintiff all such other relief as this Court deems just and proper.

Date: November 5, 2009

**IDEARC MEDIA LLC**

By: s/Abigail A. Clapp

James G. Richmond (ARDC 6206371)  
Abigail A. Clapp (ARDC 6269540)  
GREENBERG TRAURIG, LLP  
77 West Wacker Drive  
Suite 3100  
Chicago, IL 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435